

EXHIBIT “E”



April 2, 2024

OF COUNSEL:
SHEILA F. FLESHMAN*+

LA PLATA OFFICE:
102 Centennial Street, Suite 102
La Plata, MD 20646
301-934-2490

Writer's Direct Dial: (240) 510-9212

Writer's E-mail address:
mfoley@scblawyers.com

VIA ELECTRONIC MAIL ONLY

Patrick C. Timoney, Esq.
Devine Timoney Law Group
1777 Sentry Pkwy. West
Blue Bell, PA 19422

Re: *Andrew Lee Warnick v. DPL*
Our File No. 0299-43523

Dear Patrick:

I am in receipt of your correspondence of March 22, 2024 seeking additional documents as a result of responses elicited during the deposition of Patrick Dubinski.

Specifically, you have requested the following:

1. List of properties and rooms that Dubinski discussed at pp. 39-40.
2. Notes of Dubinski referenced at p. 90.
3. Salisbury Door and Hardware quote.
4. Standards referenced by Dubinski at pg. 20.

You refer to certain previous Document Requests (Nos. 4, 8 and 10) that you believe these documents (if they exist and are in DPL's possession) would require their production.

Notwithstanding any contrary position DPL may take regarding the breadth of the discovery, I am dealing with my corporate client regarding your letter and will provide my client's response to your requests by April 12, 2024.

Please let me know if that timeframe causes any problems on your end.

Patrick Timoney, Esq.
April 2, 2024
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Sincerely,

A handwritten signature in blue ink that reads "Mark T. Foley". The signature is written in a cursive, flowing style.

Mark T. Foley

MTF/jvw